

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

iMedia Brands, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10852 (KBO)

(Jointly Administered)

Re: Docket Nos. 269, 293

**SECOND AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JULY 28, 2023 AT 1:00 P.M. (EASTERN TIME)³**

**THE BELOW LISTED MATTER HAVE BEEN RESOLVED OR ADJOURNED.
THE COURT HAS CANCELLED THE HEARING.**

MATTERS FOR WHICH COCS HAVE BEEN FILED

1. **Tax Motion** – Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 6/29/23] ([Docket No. 6](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Office of the United States Trustee (“Trustee”) and the Official Committee of Unsecured Creditors (the “Committee”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); iMedia Brands, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors’ service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

² **Amended items are in bold.**

³ This agenda contains hyperlinks to filed documents pursuant to the Court’s Interim Order re: Cessation of Hand Deliveries, dated March 13, 2020. Parties may access the filed documents through the hyperlink for a fee through the Court’s website at www.deb.uscourts.gov, or the documents may be obtained for free by accessing the Debtors’ restructuring website at <https://cases.stretto.com/mediabrand/>.

Responses Received:

- a. Omnibus Objection of the Official Committee of Unsecured Creditors to Certain First Day Motions and Entry of Final Orders Granting the Same [Filed: 7/17/23] ([Docket No. 158](#)).

Related Documents:

- a. Notice of Filing of Exhibit C to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 6/29/23] ([Docket No. 14](#)).
- b. [Signed] Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 6/30/23] ([Docket No. 64](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 7/3/23] ([Docket No. 79](#)).
- d. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 7/25/23] ([Docket No. 254](#)).
- e. [Signed] Final Order (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Filed: 7/26/23] ([Docket No. 283](#)).

Status: The Court has entered an order on this matter. No hearing is necessary.

2. **Cash Management Motion** – Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 6/29/23] ([Docket No. 8](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received:

- a. Informal comments from PNC Bank, National Association.
- b. Informal comments from the Trustee.
- c. Omnibus Reservation of Rights of the Official Committee of Unsecured Creditors to Certain First Day Motions and Entry of Final Orders Granting the Same [Filed: 7/17/23] ([Docket No. 159](#)).

Related Documents:

- a. Certification of Counsel Submitting Revised Interim Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Perform Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 6/30/23] ([Docket No. 62](#)).
- b. [Signed] Interim Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Perform Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 6/30/23] ([Docket No. 67](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 7/3/23] ([Docket No. 76](#)).
- d. Declaration of James Alt in Support of Supplement to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 7/25/23] ([Docket No. 252](#)).
- e. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 7/25/23] ([Docket No. 255](#)).

Status: A certification of counsel has been filed. The Debtors request entry of the order attached to the certification of counsel. No hearing will be necessary unless the Court has any questions. **To the extent a hearing is necessary, it is adjourned to a date to be determined.**

- 3. **Insurance Motion** – Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, (II) Authorizing Continuation of Insurance Premium Financing Agreement, (III) Authorizing Continuation and Renewal of Surety Bond Program, and (IV) Granting Related Relief [Filed: 6/29/23] ([Docket No. 10](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 14, 2023 at 4:00 p.m. (Eastern Time) for the Chubb Companies. Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received:

- a. Informal comments from the Chubb Companies.
- b. Omnibus Reservation of Rights of the Official Committee of Unsecured Creditors to Certain First Day Motions and Entry of Final Orders Granting the Same [Filed: 7/17/23] ([Docket No. 159](#)).

Related Documents:

- a. [Signed] Interim Order (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, (II) Authorizing Continuation of Insurance Premium Financing Agreement, (III) Authorizing Continuation and Renewal of Surety Bond Program and (IV) Granting Related Relief [Filed: 7/3/23] ([Docket No. 74](#)).
- b. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, (II) Authorizing Continuation of Insurance Premium Financing Agreement, (III) Authorizing Continuation and Renewal of Surety Bond Program, and (IV) Granting Related Relief [Filed: 7/3/23] ([Docket No. 86](#)).
- c. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, (II) Authorizing Continuation of Insurance Premium Financing Agreement, (III) Authorizing Continuation and Renewal of Surety Bond Program, and (IV) Granting Related Relief [Filed: 7/25/23] ([Docket No. 257](#)).
- d. [Signed] Final Order (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, (II) Authorizing Continuation of Insurance Premium Financing Agreement, (III) Authorizing Continuation and Renewal of Surety Bond Program, and (IV) Granting Related Relief [Filed: 7/26/23] ([Docket No. 285](#)).

Status: The Court has entered an order on this matter. No hearing is necessary.

- 4. **Customer Programs Motion** – Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 6/29/23] ([Docket No. 11](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received:

- a. Informal comments from the Committee.

Related Documents:

- a. Certification of Counsel Submitting Revised Interim Order (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 6/30/23] ([Docket No. 71](#)).
- b. [Signed] Interim Order (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 7/3/23] ([Docket No. 73](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 7/3/23] ([Docket No. 81](#)).
- d. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 7/25/23] ([Docket No. 262](#)).
- i. Notice of Withdrawal of Docket No. 262 [Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief] [Filed: 7/26/23] ([Docket No. 278](#)).
- e. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 7/26/23] ([Docket No. 282](#)).
- f. **[Signed] Final Order (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [Filed: 7/27/23] ([Docket No. 301](#)).**

Status: **The Court has entered an order on this matter. No hearing is necessary.**

- 5. **Creditor Matrix Motion** – Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 50 Creditors List, (II) Authorizing Redaction of Certain Personal Identification Information, (III)

Modifying the Requirement to File a List of All Equity Security Holders of iMedia Brands, Inc. and Modifying Notice Thereto, and (IV) Granting Related Relief [Filed: 6/29/23] ([Docket No. 12](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received: None.

Related Documents:

- a. Certification of Counsel Submitting Revised Interim Order (I) Authorizing Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 50 Creditors List, (II) Authorizing Redaction of Certain Personal Identification Information, (III) Modifying the Requirement to File a List of Equity Security Holders of iMedia Brands, Inc. and Modifying Notice Thereto, and (IV) Granting Related Relief [Filed: 6/30/23] ([Docket No. 69](#)).
- b. [Signed] Interim Order (I) Authorizing Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 50 Creditors List, (II) Authorizing Redaction of Certain Personal Identification Information, (III) Modifying the Requirement to File a List of Equity Security Holders of iMedia Brands, Inc. and Modifying Notice Thereto, and (IV) Granting Related Relief [Filed: 7/3/23] ([Docket No. 75](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 50 Creditors List, (II) Authorizing Redaction of Certain Personal Identification Information, (III) Modifying the Requirement to File a List of All Equity Security Holders of iMedia Brands, Inc. and Modifying Notice Thereto, and (IV) Granting Related Relief [Filed: 7/3/23] ([Docket No. 85](#)).
- d. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 50 Creditors List, (II) Authorizing Redaction of Certain Personal Identification Information, (III) Modifying the Requirement to File a List of All Equity Security Holders of iMedia Brands, Inc. and Modifying Notice Thereto, and (IV) Granting Related Relief [Filed: 7/25/23] ([Docket No. 258](#)).
- e. [Signed] Final Order (I) Authorizing Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 50 Creditors List, (II) Authorizing Redaction of Certain Personal Identification Information, (III) Modifying the Requirement to File a List of All Equity Security Holders of iMedia Brands, Inc. and Modifying Notice Thereto, and (IV) Granting Related Relief [Filed: 7/26/23] ([Docket No. 286](#)).

Status: The Court has entered an order on this matter. No hearing is necessary.

6. **Lien Claimants Motion** – Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants and Related

Obligations, (II) Authorizing Debtors to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and (III) Granting Related Relief [Filed: 6/29/23] ([Docket No. 13](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received:

- a. Omnibus Objection of the Official Committee of Unsecured Creditors to Certain First Day Motions and Entry of Final Orders Granting the Same [Filed: 7/17/23] ([Docket No. 158](#)).

Related Documents:

- a. Debtors' Motion for Entry of an Order Shortening Notice Related to: (A) Debtors' Motion for Entry of Interim and Final Orders (I)(A) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief; and (B) Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants and Related Obligations, (II) Authorizing Debtors to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and (III) Granting Related Relief [Filed: 7/3/23] ([Docket No. 92](#)).
- b. [Signed] Order Shortening Notice Related to: (A) Debtors' Motion for Entry of Interim and Final Orders (I) (A) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief; and (B) Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants and Related Obligations, (II) Authorizing Debtors to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and (III) Granting Related Relief [Filed: 7/5/23] ([Docket No. 98](#)).
- c. [Signed] Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants and Related Obligations, (II) Authorizing Debtors to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and (III) Granting Related Relief [Filed: 7/5/23] ([Docket No. 110](#)).
- d. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants and Related Obligations, (II) Authorizing Debtors to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and (III) Granting Related Relief [Filed: 7/5/23] ([Docket No. 112](#)).
- e. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants

and Related Obligations, (II) Authorizing Debtors to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and (III) Granting Related Relief [Filed: 7/25/23] ([Docket No. 259](#)).

- f. [Signed] Final Order (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants and Related Obligations, (II) Authorizing Debtors to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and (III) Granting Related Relief [Filed: 7/26/23] ([Docket No. 287](#)).

Status: The Court has entered an order on this matter. No hearing is necessary.

7. **NOL Motion** – Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Filed: 6/29/23] ([Docket No. 15](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received: None.

Related Documents:

- a. Certification of Counsel Submitting Revised Interim Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Filed: 6/30/23] ([Docket No. 70](#)).
- b. [Signed] Interim Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Filed: 7/3/23] ([Docket No. 77](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Filed: 7/3/23] ([Docket No. 87](#)).
- d. Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Filed: 7/25/23] ([Docket No. 260](#)).
- e. [Signed] Final Order (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and (II) Granting Related Relief [Filed: 7/26/23] ([Docket No. 288](#)).

Status: The Court has entered an order on this matter. No hearing is necessary.

8. **Utilities Motion** – Debtors’ Motion for Entry of Interim and Final Orders (I)(A) Approving the Debtors’ Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors’ Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief [Filed: 6/29/23] ([Docket No. 16](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received:

- a. Informal comments from the Committee.

Related Documents:

- a. Debtors’ Motion for Entry of an Order Shortening Notice Related to: (A) Debtors’ Motion for Entry of Interim and Final Orders (I)(A) Approving the Debtors’ Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors’ Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief; and (B) Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants and Related Obligations, (II) Authorizing Debtors to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and (III) Granting Related Relief [Filed: 7/3/23] ([Docket No. 92](#)).
- b. [Signed] Order Shortening Notice Related to: (A) Debtors’ Motion for Entry of Interim and Final Orders (I) (A) Approving the Debtors’ Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors’ Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief; and (B) Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Lien Claimants and Related Obligations, (II) Authorizing Debtors to Pay Certain Prepetition Claims of Certain Section 503(b)(9) Claimants, and (III) Granting Related Relief [Filed: 7/5/23] ([Docket No. 98](#)).
- c. [Signed] Interim Order (I)(A) Approving the Debtors Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors’ Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief [Filed: 7/5/23] ([Docket No. 111](#)).
- d. Notice of Entry of Interim Order and Final Hearing Regarding Debtors’ Motion for Entry of Interim and Final Orders (I)(A) Approving the Debtors’ Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors’ Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief [Filed: 7/5/23] ([Docket No. 113](#)).

- e. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I)(A) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief [Filed: 7/25/23] ([Docket No. 261](#)).
- f. [Signed] Final Order (I)(A) Approving the Debtors Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors' Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; and (II) Granting Related Relief [Filed: 7/26/23] ([Docket No. 289](#)).

Status: The Court has entered an order on this matter. No hearing is necessary.

- 9. **Wages Motion** – Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Employee Benefits Obligations and Other Compensation, and (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [Filed: 6/29/23] ([Docket No. 9](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 14, 2023 at 4:00 p.m. (Eastern Time) for ACE American Insurance Company, Federal Insurance Company, Great Northern Insurance Company, Westchester Surplus Lines Insurance Company, Illinois Union Insurance Company, and together with each of their U.S.-based affiliates and successors (collectively, the "Chubb Companies"). Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received:

- a. Informal comments from the Chubb Companies.
- b. Omnibus Reservation of Rights of the Official Committee of Unsecured Creditors to Certain First Day Motions and Entry of Final Orders Granting the Same [Filed: 7/17/23] ([Docket No. 159](#)).

Related Documents:

- a. Certification of Counsel Submitting Revised Interim Order (I) Authorizing Debtors to (A) Pay Prepetition Wages, Employee Benefits Obligations and Other Compensation, (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [Filed: 6/30/23] ([Docket No. 65](#)).
- b. [Signed] Interim Order (I) Authorizing Debtors to (A) Pay Prepetition Wages, Employee Benefits Obligations and Other Compensation, (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [Filed: 6/30/23] ([Docket No. 66](#)).

- c. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Employee Benefits Obligations and Other Compensation, and (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [Filed: 7/3/23] ([Docket No. 78](#)).
- d. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Employee Benefits Obligations and Other Compensation, and (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [Filed: 7/26/23] ([Docket No. 270](#)).
- e. [Signed] Final Order (I) Authorizing Debtors to (A) Pay Prepetition Wages, Employee Benefits Obligations and Other Compensation, (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [Filed: 7/26/23] ([Docket No. 290](#)).

Status: The Court has entered an order on this matter. No hearing is necessary.

CONTESTED MATTERS GOING FORWARD

- 10. **DIP Motion** – Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/3/23] ([Docket No. 88](#)).

Response Deadline: July 17, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received:

- a. Limited Objection of B.H. Multi Com Corp. and B.H. Multi Color Corp. to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/17/23] ([Docket No. 161](#)).
- b. Limited Objection of Synacor, Inc. to the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief,

Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/17/23] ([Docket No. 169](#)).

- i. **Notice of Withdrawal of Documents [Filed: 7/27/23] ([Docket No. 297](#)).**
- c. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Senior Secured Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders, and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/24/23] ([Docket No. 235](#)).
- i. Declaration of David MacGreevey in Support of Committee Sale Objection and Committee DIP Objection [Filed: 7/24/23] ([Docket No. 239](#)).

Replies Received:

- a. Debtors' Reply in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/25/23] ([Docket No. 264, Exhibit B](#))
- i. Debtors' Motion for Leave to File a Late Reply in Support of DIP Motion [Filed: 7/25/23] ([Docket No. 264](#))
- b. Reply of Siena Lending Group, LLC in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/26/23] ([Docket No. 266, Exhibit A](#)).
- i. Motion of Siena Lending Group, LLC for Leave to File Late Reply in Support of the Debtors' DIP Motion [Filed: 7/26/23] ([Docket No. 266](#)).

Related Documents:

- a. Declaration of James Alt in Support of Debtors' Motion to Obtain Postpetition Debtor in Possession Financing [Filed: 7/3/23] ([Docket No. 89](#)).
- b. Declaration of Eugene Lee in Support of Debtors' Motion to Obtain Postpetition Debtor in Possession Financing [Filed: 7/3/23] ([Docket No. 90](#)).
- c. Debtors' Motion for Entry of an Order Shortening Notice Related to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/3/23] ([Docket No. 91](#)).
- d. [Signed] Order Shortening Notice Related to Debtors' Motion for Entry of an Order Shortening Notice Related to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/5/23] ([Docket No. 97](#)).
- e. Notice of Filing of Revised Interim Order (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/5/23] ([Docket No. 106](#)).
- f. Certification of Counsel Submitting Revised Interim Order (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/5/23] ([Docket No. 109](#)).
- g. [Signed] Interim Order (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to

Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/6/23] ([Docket No. 116](#)).

- h. Notice of Entry of Interim Order and Final Hearing Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/6/23] ([Docket No. 117](#)).
- i. Notice of Rescheduled Final Hearing on Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/14/23] ([Docket No. 156](#)).
- j. Notice of Filing of Proposed Final Order (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552 [Filed: 7/26/23] ([Docket No. 291](#)).
- k. **Notice of Status Conference** [Filed: 7/27/23] ([Docket No. 304](#)).

Status: This matter is adjourned to a date to be determined. A status conference for this matter is scheduled for July 31, 2023 at 1:00 p.m. (Eastern Time).

- 11. **Sale Motion** – Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/3/23] ([Docket No. 93](#)).

Response Deadline: July 20, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Trustee and the Committee.

Cure Objection Deadline: July 18, 2023. Extended to July 24, 2023 for the Trustee and the Committee.

Sale Objections:

- a. Objection of the Chubb Companies with Respect to (1) Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief; and (2) Debtors' Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/18/23] ([Docket No. 183](#)).
- b. Limited Objection By C&B Newco, LLC to Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/20/23] ([Docket No. 215](#)).
- c. Response of Synchrony Bank to the Debtors' Sale Motion [Filed: 7/20/23] ([Docket No. 216](#)).
- d. Apparel Solutions Inc.'s Objection to Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/21/23] ([Docket No. 228](#)).
- e. Limited Objection of IV Media, LLC [Filed: 7/24/23] ([Docket No. 231](#)).
- f. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/24/23] ([Docket No. 233](#)).
- i. Declaration of David MacGreevey in Support of Committee Sale Objection and Committee DIP Objection [Filed: 7/24/23] ([Docket No. 239](#)).
- g. Oracle's Limited Objection to and Reservation of Rights Regarding: (1) Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and

Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief; and (2) Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases (“Assumption Notice”) [Filed: 7/24/23] ([Docket No. 234](#)).

- h. Kinbow, Inc.’s Objection to Debtors’ Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors’ Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors’ Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/24/23] ([Docket No. 236](#)).
- i. Objection of Clarus Commerce LLC To Debtors’ Motion Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors’ Assets Free and Clear of Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors’ Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/26/23] ([Docket No. 280](#)).
- j. Limited Objection of B.H. Multi Com Corp. to Debtors’ Motion Pursuant to Sections 105, 363 and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors’ Assets Free and Clear of Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors’ Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/26/23] ([Docket No. 281](#)).

Cure/Assumption & Assignment Objections:

- a. Limited Objection of CBL & Associates Management, Inc. to Debtors’ Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/14/23] ([Docket No. 147](#)).
- b. Objection of New York Life Insurance Company to Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/17/23] ([Docket No. 163](#)).
- c. Objection by C&B IPCO, LLC to Debtors’ Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/17/23] ([Docket No. 164](#)).
- d. Creditor’s (Exorigos Ltd.) Objection to Cure Cost and Proposed Cure Payment [Filed: 7/18/23] ([Docket No. 173](#)).
- e. Response of Radius Global Solutions LLC to Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/18/23] ([Docket No. 175](#)).

- f. Spectrum Management Holding Company, LLC's Objection to Cure Cost, Cure Payment, and Assumption and Assignment of Executory Contract [Filed: 7/18/23] ([Docket No. 176](#)).
- g. Objection of Creditor VXi Global Solutions, LLC to Proposed Assumption and Assignment of Contract [Filed: 7/18/23] ([Docket No. 177](#)).
- i. Exhibit A to Objection of Creditor VXi Global Solutions, LLC to Proposed Assumption and Assignment of Contract [Filed: 7/18/23] ([Docket No. 178](#)).
- h. Limited Objection of G&I X Montclair on Center LLC to Debtors' Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/18/23] ([Docket No. 180](#)).
- i. Lumen's Objection and Reservation of Rights to Proposed Cure Amount [Filed: 7/18/23] ([Docket No. 181](#)).
- j. Limited Objection and Reservation of Rights of Comcast Cable Communications, LLC and Comcast Cable Communications Management, LLC to the Debtors' Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/18/23] ([Docket No. 182](#)).
- k. Objection of the Chubb Companies with Respect to (1) Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief; and (2) Debtors' Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/18/23] ([Docket No. 183](#)).
- l. Objection of InvestStrong, LLC to Debtors' Proposed Cure Amount; and Objection to Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/18/23] ([Docket No. 185](#)).
- m. Objection of Creditor GG Software LP d/b/a NitroPay to Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/18/23] ([Docket No. 186](#)).
- n. Objection of Pontus IMB Portfolio, LLC to Debtors' Purchased Contracts Schedule [Filed: 7/18/23] ([Docket No. 189](#)).
- o. Objection of Commerce Technologies, LLC to Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/19/23] ([Docket No. 202](#)).

- p. Objection of ChannelAdvisor Corporation to Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/19/23] ([Docket No. 203](#)).
- i. Exhibit A to Objection of ChannelAdvisor Corporation to Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/20/23] ([Docket No. 207](#)).
- q. Objection of the Official Committee of Unsecured Creditors to the Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/20/23] ([Docket No. 208](#)).
- r. DIRECTV, LLC's Limited Objection to Proposed Cure Amounts and Reservation of Rights with Respect to Notice of Potential Assumption and Assignment [Filed: 7/20/23] ([Docket No. 218](#)).
- s. Objection of Akamai Technologies, Inc. to Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/24/23] ([Docket No. 230](#)).
- t. Oracle's Limited Objection to and Reservation of Rights Regarding: (1) Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief; and (2) Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases ("Assumption Notice") [Filed: 7/24/23] ([Docket No. 234](#)).
- u. Objection of Salesforce, Inc. to the Proposed Assumption of Certain Executory Contracts and Cure Costs, in Connection with the Sale and Reservation of Rights [Filed: 7/26/23] ([Docket No. 273](#)).
- i. Declaration of Kevin Ramirez in Support of the Objection of Salesforce, Inc. to the Proposed Assumption of Certain Executory Contracts and Cure Costs, in Connection with the Sale and Reservation of Rights [Filed: 7/26/23] ([Docket No. 274](#)).

Replies Filed:

- a. Reply of Siena Lending Group, LLC in Response to Limited Objection By C&B Newco, LLC to Sale Motion [Filed: 7/25/23] ([Docket No. 253](#)).
- b. Debtors' Omnibus Reply to the Objections to the Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset

Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/25/23] ([Docket No. 265, Exhibit B](#)).

- i Debtors' Motion for Leave to File a Late Reply in Support of Sale Motion [Filed: 7/25/23] ([Docket No. 265](#)).

Related Documents:

- a. Declaration of Eugene Lee in Support of the Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/4/23] ([Docket No. 94](#)).
- i. Supplemental Declaration of Eugene Lee in Support of the Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/24/23] ([Docket No. 243](#)).
- b. Notice of Sale Hearing [Filed: 7/5/23] ([Docket No. 114](#)).
- c. Affidavit of Publication of Notice of Sale Hearing in The New York Times (National Edition) [Filed: 7/11/23] ([Docket No. 130](#)).
- d. Affidavit of Publication of Notice of Sale Hearing in the Star Tribune Media Company LLC [Filed: 7/11/23] ([Docket No. 131](#)).
- e. Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases [Filed: 7/11/23] ([Docket No. 132](#)).
- f. Notice of Auction for All or Substantially All Debtors' Assets in Furtherance of Sale Motion [Filed: 7/24/23] ([Docket No. 244](#)).
- g. **Notice of Cancellation of Auction** [Filed: 7/27/23] ([Docket No. 303](#)).
- h. **Notice of Status Conference** [Filed: 7/27/23] ([Docket No. 304](#)).

Status: **This matter is adjourned to a date to be determined. A status conference for this matter is scheduled for July 31, 2023 at 1:00 p.m. (Eastern Time).**

- 12. **Motion for Leave** – Debtors' Motion for Leave to File a Late Reply in Support of DIP Motion [Filed: 7/25/23] ([Docket No. 264](#)).

Response Deadline: None.

Reponses Received: None.

Related Documents:

- a. Debtors' Reply in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/25/23] ([Docket No. 264, Exhibit B](#)).
- b. **[Signed] Order Granting Debtors' Motion for Leave to File a Late Reply in Support of DIP Motion [Filed: 7/27/23] ([Docket No. 298](#)).**

Status: **The Court has entered an order on this matter. No hearing is necessary.**

13. **Motion for Leave** – Debtors' Motion for Leave to File a Late Reply in Support of Sale Motion [Filed: 7/25/23] ([Docket No. 265](#)).

Response Deadline: None.

Reponses Received: None.

Related Documents:

- a. Debtors' Omnibus Reply to the Objections to the Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/25/23] ([Docket No. 265, Exhibit B](#)).
- b. **[Signed] Order Granting Debtors' Motion for Leave to File a Late Reply in Support of Sale Motion [Filed: 7/27/23] ([Docket No. 300](#)).**

Status: **The Court has entered an order on this matter. No hearing is necessary.**

14. **Motion for Leave** – Motion of Siena Lending Group, LLC for Leave to File Late Reply in Support of the Debtors' DIP Motion [Filed: 7/26/23] ([Docket No. 266](#)).

Response Deadline: None.

Reponses Received: None.

Related Documents:

- a. Reply of Siena Lending Group, LLC in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, (B) Grant Liens and Superpriority Administrative Expense Claims to Post-Petition Lenders and (C) Utilize Cash Collateral, (II) Providing Adequate Protection to Pre-Petition Secured Parties, (III) Modifying the Automatic Stay, (IV) Granting Related Relief, Pursuant to 11 U.S.C. Sections 105, 361, 362, 363, 364, 503, 506, 507 and 552, and (V) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001 and Local Rule 4001-2 [Filed: 7/26/23] ([Docket No. 266, Exhibit A](#)).
- b. **[Signed] Order Granting Motion of Siena Lending Group, LLC for Leave to File Late Reply in Support of the Debtors' DIP Motion [Filed: 7/27/23] ([Docket No. 296](#)).**

Status: **The Court has entered an order on this matter. No hearing is necessary.**

15. **Motion to Adjourn** – Emergency Motion of the Official Committee of Unsecured Creditors for Entry of Order Adjourning July 28, 2023 Hearing [Filed: 7/26/23] ([Docket No. 277](#)).

Response Deadline: None.

Reponses Received:

- a. **Joinder of Kinbow, Inc. to Emergency Motion of the Official Committee of Unsecured Creditors for Entry of Order Adjourning July 28, 2023 Hearing [Filed: 7/27/23] ([Docket No. 294](#)).**

Related Documents: None.

Status: **A status conference for this matter is scheduled for July 31, 2023 at 1:00 p.m. (Eastern Time).**

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Dated: July 27, 2023
Wilmington, Delaware

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